

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF OKLAHOMA**

(1) LADONNA PARIS,	)	
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 22-cv-00235-TCK-JFJ
	)	
(1) RONNI CARROCIA;	)	
(2) DAYLAN ROOT;	)	
(3) TY BURNS;	)	
(4) CITY OF TULSA;	)	
(5) G.T. BYNUM, IV;	)	
	)	
	)	
Defendants.	)	

**STATUS REPORT ON REMOVED ACTION**

This form must be filed by the removing party at the time of filing the notice of removal or within five (5) days of the filing of the notice of removal in the U.S. District Court. **Note:** Additional sheets may be used as necessary.

**I. State Court Information**

Identify the court from which the case is being removed.	Court: Tulsa County District Court
Specify the number assigned to the case in that court.	Number: CJ-2022-01434

**II. Style of the Case**

Include all termed/dismissed and pending Plaintiff(s), Defendant(s), Intervenor(s), Counter-Claimant(s), Counter-Defendant(s), Cross-Claimant(s), Cross-Defendant(s), Third-Party Plaintiff(s), and Third-Party Defendant(s). Indicate the party type and the attorney(s) of record for each party.

<u>Party(ies)</u>	<u>Party Type</u>	<u>Attorney(s) of Record</u> <small>(OBA #, Law Firm &amp; Address, 10-Digit Phone #)</small>
		Damario Solomon-Simmons, OBA #20340 Kymberli J.M. Heckenkemper, OBA #33524 SolomonSimmonsLaw, PLLC 601 S. Boulder Ave., Ste. 600 Tulsa, OK 74119 (918) 551-8999
LaDonna Paris	Plaintiff	J. Spencer Bryan, OBA #19419 Steven J. Terrill, OBA #20869 Bryan & Terrill, PLLC 3015 E. Skelly Dr., Ste. 400 Tulsa, OK 74105 (918) 935-2777

		R. Lawson Vaughn, OBA #21557 Hayes T. Martin, OBA # 32059 City of Tulsa, 175 E. 2 <sup>nd</sup> St Tulsa, OK 74103 (918) 596-7717
City of Tulsa	Defendant	
Ronni Carrocia, Daylan Root, Ty Burns George Theron Bynum, IV	Defendants	

### III. Jury Demand

Was a Jury Demand made in State Court? ☐ Yes ☐ Yes, but rescinded ☒ No

Requesting Party(ies)	Date of Request

### IV. Complaints, Counter-Claims, Cross-Claims, Third Party Complaints, and Intervenor Complaints

List all complaint-type documents (Complaints, Amended Complaints, Counter-Claims, Amended Counter-Claims, Cross-Claims, Amended Cross-Claims, Third-Party Complaints, Amended Third-Party Complaints, Intervenor Complaints, and Amended Intervenor Complaints) filed in State Court. Indicate filing party(ies), against whom, and date filed.

Complaint-Type Document(s)	Filing Party(ies)	Against Whom	Date Filed
Complaint	LaDonna Paris	Ronni Carrocia, Daylan Root, Ty Burns, City of Tulsa, George Theron Bynum, IV	May 10, 2022

### V. Unserved Parties

List parties not served at time of case removal.

Unserved Party(ies)	Reason(s) for No Service
Ronni Carrocia	
Daylan Root	
Ty Burns	

George Theron Bynum, IV

**VI. Answer**

Was an Answer made in State Court? Yes ☐ No ☒

If **Yes**, indicate document answered, filing party(ies), and date filed.

Document Answered	Filing Party(ies)	Date Filed

**VII. Nonsuited, Dismissed or Terminated Parties**

List party(ies) nonsuited, dismissed or terminated from the State Court action. Indicate date of termination/dismissal.

Nonsuited, Dismissed or Terminated Party(ies)	Date Terminated/Dismissed
N/A	

**VIII. Remaining Claims of the Parties**

List all pending complaint-type documents from Section IV. Indicate filing party(ies), against whom and date filed.

Pending Complaint-Type Document(s)	Filing Party(ies)	Against Whom	Date Filed
LaDonna Paris	Plaintiff	Ronni Carrocia, Daylan Root, Ty Burns, City of Tulsa, George Theron Bynum, IV	May 10, 2022

**IX. Pending Motions**

List all contested pending motions. Indicate filing party(ies) and date filed.

Pending Motions	Filing Party(ies)	Date Filed
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N/A

Removing Party(ies): City of Tulsa  
Attorney Signature: /s/R. Lawson Vaughn  
Printed Name: R. Lawson Vaughn  
OBA Number: 21557  
Law Firm: City of Tulsa  
Address: City Hall, One Technology Center, 175 East Second Street, Ste. 685  
City, State, Zip Code: Tulsa, OK 74103  
10-Digit Phone Number: (918) 596-7717  
Facsimile: (918) 596-9700  
Email Address: [lvaughn@cityoftulsa.org](mailto:lvaughn@cityoftulsa.org)

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 31, 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Name(s) Only:

Damario Solomon-Simmons  
[dss@solomonsimmonsllaw.com](mailto:dss@solomonsimmonsllaw.com)  
Kymberli J.M. Heckenkemper  
[kheckenkemper@solomonsimmonsllaw.com](mailto:kheckenkemper@solomonsimmonsllaw.com)  
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[jsbryan@bryanterrill.com](mailto:jsbryan@bryanterrill.com)  
Steven J. Terrill  
[sjterrill@bryanterrill.com](mailto:sjterrill@bryanterrill.com)

I hereby certify that on \_\_\_\_\_, I served the same document by:

☐ U.S. Postal Service      ☐ In-Person Delivery      ☐ Courier Service      ☐ Email

on the following, who are not registered participants of the ECF System:

/s/ R. Lawson Vaughn  
R. LAWSON VAUGHN